

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

C.A. NO: 3:16-CV-30142-MGM

TRESLAN A. WILLIAMS as
Personal representative of the Estate
of Junior Williams
Plaintiff,

v.

KAWASAKI MOTORS CORP., U.S.A.,
KAWASAKI HEAVY INDUSTRIES, LTD,
and SPRINGFIELD MOTOR SPORTS, LLC
Defendants.

**KAWASAKI MOTORS CORP., U.S.A. AND KAWASAKI HEAVY INDUSTRIES, LTD'S
MOTION FOR THE ENTRY OF A PROTECTIVE ORDER REGARDING THE
PROPOSED DEPOSITION OF KAWASAKI HEAVY INDUSTRIES, LTD. AND
REQUEST FOR HEARING**

Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure and Local Rules 7.1 and 37.1, Defendants Kawasaki Motors Corp., U.S.A. ("KMC") and Kawasaki Heavy Industries, Ltd. ("KHI") hereby move for the Entry of a Protective Order Regarding the Proposed Rule 30(b)(6) Deposition of KHI.

WHEREFORE, for the reasons set forth in the accompanying Memorandum of Law, KMC and KHI request that this Court enter a protective order pursuant to Fed. R. Civ. P. 26(c) limiting the scope of production and inquiry at KHI's deposition to model year 2006 through

2010 of the subject model motorcycle.

REQUEST FOR ORAL ARGUMENT

The moving parties request a hearing pursuant to Local Rule 7.1(d) to assist the Court with its consideration of this matter.

Respectfully Submitted,
Kawasaki Motors Corp., U.S.A., and
Kawasaki Heavy Industries, LTD
By their attorneys,

/s/ Peter M. Durney
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CERTIFICATE OF COUNSEL PURSUANT TO RULE 7.1(a)(2)

I, Peter M. Durney, attorney for the defendant, hereby certify that on January 9, 2019, I spoke with plaintiff's counsel Terrence L. Butler, and on January 11, 2019, I sent a letter to him in a good faith attempt to resolve the issues raised by plaintiff's Rule 30(b)(6) deposition notice. Mr. Butler sent a response letter on February 28, 2019, which necessitated the filing of this motion.

/s/ Peter M. Durney
Peter M. Durney

CERTIFICATE OF SERVICE

I, Peter M. Durney, attorney for Kawasaki Motors Corp., U.S.A. and Kawasaki Heavy Industries, LTD, hereby certify that on the 5th day of March, 2019, a true copy of the was filed through the ECF System and sent electronically to the registered participants as identified on the Notice of Electronic Filing and that paper copies will be served by first-class mail, postage prepaid, upon anyone indicated as a non-registered participant:

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/s/ Peter M. Durney
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